

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ERIK SHEEHAN,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.

Defendant.

CIVIL ACTION

NO. 04 CV 12364 JGD

**MOTION TO EXTEND TIME TO RESPOND TO  
PLAINTIFF'S MOTION TO COMPEL**

Defendant Verizon Communications, Inc. hereby move, with the assent of counsel for the Plaintiff for an extension of time through December 2, 2005 to respond to the Plaintiff's Motion to Compel. As grounds therefore Verizon states as follows:

1. The requested additional time is needed in order for the Defendant to investigate whether additional documents sought by the Motion to Compel exist, and to otherwise formulate a response to the Motion to Compel.

3. Due to Thanksgiving Day holiday, Verizon and its counsel will need a brief extension of time to respond to Motion to Compel through December 2, 2005;

4. Counsel for Verizon has consulted with Plaintiff's counsel regarding the extension, and Plaintiff's counsel has assented to the extension and this Motion.

6. The request is not interposed for delay, and no party will be prejudiced given the assent of Plaintiff's counsel.

**WHEREFORE**, Verizon requests that the Court grant this motion.

ERIK SHEEHAN By his attorney,  _____ /s/ Paul Tuttle Dominic Finelli, BBO #165450 Paul Tuttle, BBO #661786 lawoffice@reverelaw.com Attorneys At Law Barrister Hall 199 Revere Street Revere, MA 02151 (781) 286-1484	VERIZON COMMUNICATIONS, INC. By its attorneys,  _____ /s/ Windy L. Rosebush Timothy P. Van Dyck, BBO #548347 tvandyck@EdwardsAngell.com Windy L. Rosebush, BBO #636962 wrosebush@EdwardsAngell.com Edwards & Angell, LLP 101 Federal Street Boston, MA 02110 (617) 439-4444
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Date: November 22, 2005

**CERTIFICATE OF SERVICE**

I, Windy L. Rosebush, hereby certify that on this 22<sup>nd</sup> day of November, 2005, I caused a copy of the foregoing document to be served electronically on Paul Tuttle, Barrister Hall, 199 Revere Street, Revere, MA 02151, by filing the same electronically.

\_\_\_\_\_  
/s/ Windy L. Rosebush